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May 5, 2015

VIA ECF

Honorable Valerie E. Caproni, U.S.D.J.
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Trustees of Empire State Carpenters Annuity, et al. v. Triangle Flooring
& Supply Corp., et al.; 14cv2121 (VEC)

Dear Judge Caproni:

We represent the Plaintiffs Trustees in the referenced matter. As per the discussion at the most recent conference, I write to advise as to the status of ongoing discovery. At the Court's direction, the parties and the auditors closely reviewed what records have been produced. The auditors are now satisfied that there are sufficient records to complete the audit of defendant Triangle Flooring, which, as the parties have described to the Court, would reduce the amount sought dramatically and foster settlement. In addition, the auditors are preparing audits of the remaining defendants based on the document production for the same purpose. We believe the auditors will require 4-6 weeks to complete the audit review.

As such, the parties jointly request that the conference currently scheduled for May 8, 2015 be adjourned as there will be little to report until the audit is complete.

Very truly yours,

s/s Michael Bauman

Michael Bauman

cc: Richard B. Ziskin, Esq.
Gerald V. Dandeneau, Esq.